

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Civil Action No. 3:17-cv-00727-RJC-DCK**

LA MICOACANA NATURAL, LLC,

Plaintiff,

v.

LUIS MAESTRE, an individual, d/b/a LA MICOACANA and/or LA LINDA MICOACANA et al.,

Defendant.

**DECLARATION OF LAURA L. CHAPMAN
IN SUPPORT OF
MOTION TO QUASH SUBPOENA
SERVED ON NON-PARTY PLM OPERATIONS, LLC**

I, Laura L. Chapman, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Sheppard Mullin Richter & Hampton, LLP. I represent non-party PLM Operations, LLC (“PLM”). I submit this declaration in support of the Motion to Quash Subpoena Served on Non-Party PLM Operations, LLC.

2. On July 26, 2019, I received a subpoena from Plaintiff La Michoacana Natural, LLC directed to PLM. A true and accurate copy of that subpoena is attached as Exhibit 1.

3. The attached Exhibit 2 is a true and accurate copy of the letter Plaintiff’s counsel sent to me enclosing the subpoena.

4. The attached Exhibit 3 is a true and accurate copy of an email exchange I had with Plaintiff’s counsel on July 31, 2019.

5. The attached Exhibit 4 is a true and accurate copy of my correspondence with Plaintiff's counsel on August 6, 2019.

6. The attached Exhibit 5 is a true and accurate copy of my email correspondence to Plaintiff's counsel on August 7, 2019.

7. The attached Exhibit 6 is a true and accurate copy of a letter I received from Plaintiff's counsel on August 7, 2019.

8. The attached Exhibit 7 is a true and accurate copy of a letter I sent to Plaintiff's counsel on August 9, 2019. The letter is dated August 5, 2019, but that was a mistake. The letter was actually sent on August 9, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2019, at Myrtle Beach, South Carolina.



LAURA L. CHAPMAN

CERTIFICATE OF SERVICE

I certify that I served the foregoing DECLARATION OF LAURA L. CHAPMAN IN SUPPORT OF NON-PARTY PLM OPERATIONS, LLC'S MOTION TO QUASH NON-PARTY SUBPOENA on all parties of record as follows:

Via Electronic Filing

Stephen L. Anderson (attorneys@brandxperts.com)

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Counsel for Plaintiff

Via U.S. Mail

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/s/ Corby C. Anderson

Corby C. Anderson